UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX 75 Hawthorne Street San Francisco, CA 94105

February 1, 2000

Mr. William A. Collins

Regional Site Manager Bldg 3408, 2nd floor 3430 Bundy Avenue March ARB, CA 92518-1504

Re: George AFB - Draft Final Finding of Suitability to Transfer (FOST) for Subparcels D-8

D-9, F-1, J-4 through J-7 and the Southeast Portion of D-5

Dear Mr. Collins:

The U.S. Environmental Protection Agency (EPA), Region IX has received the above referenced FOST from the U.S. Air Force dated January 31, 2000. The FOST addresses the property at George Air Force Base (AFB) identified as Subparcels D-8 D-9, F-1, J-4 through J-7 and the Southeast Portion of D-5. These parcels, hereinafter referred to as "the Property," are proposed for transfer to the county of San Bernardino, California.

Pursuant to this FOST, the Air Force is proposing to enter into deeds for transfer under both §§ 120(h)(3) and 120(h)(4) of the Comprehensive Environmental Response Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9620(h)(3). When entering into a deed for transfer under CERCLA § 120(h)(3), the Air Force is required to include in such deed a covenant warranting that all remedial action necessary to protect human health and the environment with respect to any hazardous substances remaining on the property has been taken before the date of the transfer, and that any additional remedial action found to be necessary after the date of transfer shall be conducted by the United States. When entering into a deed for transfer under CERCLA § 120(h)(4), the Air Force is only required to include in such deed a covenant that any additional remedial action found to be necessary after the date of transfer shall be conducted by the United States.

EPA has reviewed the Draft Final FOST and the accompanying Supplemental Environmental Baseline Survey (SEBS) dated January 31, 2000. EPA concurs with the Air Force's ECC 1 determinations for the portions of these parcels specified as ECC 1 in the FOST. EPA supports the transfer of these parcels when the following concerns are adequately addressed:

- The soil sampling locations for pesticides must include the <u>specific locations</u> identified by EPA from our previous comments in the draft FOST and other related correspondence.

- Soil sampling must be undertaken at the <u>lowest drainage point</u> of the golf course/OT-22, as it was common knowledge that pesticides were routinely applied through out the area.
- EPA must have an opportunity to review the language of the unresolved lead-based paint statement before being finalized in Section 7 as an unresolved regulatory comment. Without independent investigation or verification of certain information contained in the documentation, the undersigned concurs, to the extent set forth below (and assuming that EPA's concerns regarding soil sampling are addressed satisfactorily), with the Air Force's determination that all remedial action necessary to protect human health and the environment with respect to any hazardous substance remaining on the Property has been taken. The review of the documentation was completed pursuant to CERCLA §§ 120(h)(3) and 120(h)(4), and the sole purpose of this letter is to satisfy the requirements of these provisions. The undersigned expressly reserves all rights and authorities relating to information not contained in this FOST and accompanying documentation, whether such information is known as of this date or is discovered in the future.

If you have any questions regarding this letter please contact James Chang at (415) 744-2158.

Sincerely,

Daniel A. Meer, Chief Federal Facilities Cleanup Branch

cc: Mr. Mike Plaziak California Regional Water Quality Control Board Lahontan Region 15428 Civic Drive, Suite 100 Victorville, CA 92392-2359

> Mr. Harold Reid AFBCA/DD March 3430 Bundy Avenue, Bldg 3408 March Air Force Base, CA 92518-1504

> Mr. Calvin Cox AFBCA/DD March 3430 Bundy Avenue, Bldg 3408 March Air Force Base, CA 92518-1504

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